

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

TALMUS R. TAYLOR

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) CRIMINAL NO. 05-10067-PBS
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DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

Defendant requests that the court ask the following questions of prospective jurors:

1. Are you related to or do you know the defendant, the defendant's attorney, the Assistant U.S. Attorney, or any of the witnesses?
2. Do you have an interest in this case or have you formed or expressed any opinion regarding this case, or this type of case?
3. Are you aware of any bias or prejudice you may have regarding the parties, this case, or this type of case?
4. Do you feel that since Mr. Taylor has been indicted that he is probably guilty?
5. Do you think that Mr. Taylor must have done something wrong or he wouldn't be here charged with a serious crime?
6. It is a cardinal principle of our system of justice that every person accused of a crime is presumed to be innocent unless and until his guilt is established beyond a reasonable doubt. The presumption is not a mere formality. It is a matter of the most important substance. Additionally, the burden is upon the Government to prove beyond a reasonable doubt that a defendant is guilty of the charge made against him. Reasonable doubt exists when, after weighing and considering all the evidence, using reason and common sense, jurors cannot say that they have a settled conviction of the truth of the charge.

Would you have any difficulty accepting and applying these principles of law?

7. Have you served as a juror in any case before?

8. Have you or anyone close to you been involved in a civil or criminal trial?
9. Have you or anyone close to you ever been the victim of a crime?
10. Are you acquainted with anyone who has worked in law enforcement, such as a state or federal prosecutor, local police force, state police, FBI or CIA agent, postal inspector, drug enforcement agent, county sheriff or the IRS?
11. Have you or anyone close to you been audited by the IRS or had disputes with the IRS?
12. Have you ever used the services of a tax preparer to complete your income tax return?
13. Do you have any training or education in law, financial transactions, accounting, bookkeeping, tax return preparation or business management?
14. Have you or anyone close to you ever been employed in any capacity by a city or state government agency, or by the federal government?
15. Have you or members of your family had any affiliation with a non-profit organization, either as an employee, board member, volunteer or in any other capacity?
16. Have you ever made any charitable donations to a non-profit organization, either in cash or property such as clothing, furniture, and the like?
17. Have you ever deducted the cost of charitable donations to a non-profit organization on your income tax return?
18. Have you read or seen any publicity about income tax preparers and the IRS?
19. Would you tend to give more weight to the testimony of an IRS agent simply because he is an IRS agent?
20. Is there anything about your background or any beliefs that you hold that would make it difficult for you to serve as an impartial juror on this case?

Dated: February 13, 2006

Respectfully submitted,

TALMUS R. TAYLOR

By his attorney,

/s/ _____
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